

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

CRUZ BAYLON and
MARIA CARMEN BAYLON,

Plaintiffs,

v.

No. 1:12-cv-00052-MCA-KBM

WELLS FARGO BANK, N.A.; and
MCCARTHY & HOLTHUS, LLP
d/b/a MCCARTHY, HOTHUS & LEVINE,

Defendants.

**PLAINTIFFS' MOTION TO COMPEL
MCCARTHY & HOLTHUS TO ANSWER WRITTEN DISCOVERY**

Plaintiffs Cruz and Maria Carmen Baylon move the Court to compel Defendant McCarthy & Holthus, LLP d/b/a McCarthy, Holthus & Levine ("McCarthy") to answer written discovery. McCarthy opposes this motion.

Prior to filing this motion, the Baylons attempted to resolve these discovery disputes. By letter and by telephone, the parties conferred concerning the dispute, but were unable to resolve many of the issues. The Baylons sets forth more fully their grounds for this motion in the brief that they file in support of this motion.

The Baylons request that the Court order McCarthy to provide full and complete responses to Interrogatories Nos. 3 and 9-12 and Requests for Production Nos. 3-4, and 10, within 10 days of the entry of the Court's order.

Respectfully submitted,

FEFERMAN & WARREN, attorneys for Plaintiffs

/s/ Charles Parnall

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